



WYOMING DEPARTMENT OF CORRECTIONS

Policy and Procedure #3.212

Asbestos Safety

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| Authority: Wyoming Statute(s): 25-1-104; 25-1-105 ACA Standard(s): None Noted | Effective Date: January 1, 2015 Revision/Review History: 01/01/14 |
| | Summary of Revision/Review: Updates existing policy pursuant to annual review. |
| Cross Reference of Policy: | Supersedes Existing Policy : |
| Approved: | |
| R.O. Lampert | 12-17-14 |
| Robert O. Lampert, Director | Date |

APPROVED FOR INMATE DISTRIBUTION

REFERENCE

1. ATTACHMENTS – None Noted
2. OTHER – None Noted



I. PURPOSE

- A. **Asbestos Safety Procedures.** The purpose of this policy is to establish prescribed assessment procedures that require the Department to identify friable and potentially friable asbestos contaminating material (ACM); follow the prescribed process of reporting suspect material; sample such materials; assess the condition of suspected ACM; establish specific procedures to protect Wyoming Department of Corrections (WDOC) employees, contract workers, volunteers, and the general public in the event of an ACM release; and conduct air monitoring to determine the level of fibers in the air. This Policy does not apply to WDOC Probation and Parole offices.

II. POLICY

- A. **General Policy.** It is the policy of the WDOC to follow the assessment procedures prescribed by this policy, prior to conducting any remodel or renovation projects, or any response action for friable or non-friable asbestos containing material (ACM).
- B. **Qualified Inspectors Required.** It is the policy of the WDOC to use individuals who have been certified by the Environmental Protection Agency (EPA) as a Building inspector to complete the inspections required by this policy and make recommendations as to the appropriate response action to be taken.

III. DEFINITIONS

- A. **Asbestos Contaminating Material (ACM):** Asbestos-containing material comprised of more than one percent (1%) asbestos.
- B. **Air Monitoring:** *(For this policy only.)* Measuring the fiber content of a known volume of air collected over a known period of time.
- C. **Air Monitoring Specialist:** *(For this policy only.)* A person who performs final visual clearance inspections or any air monitoring.
- D. **Area of Public Access:** Any building, facility, or property, or only that portion thereof, that any member of the general public can enter without limitation or restriction by the owner or lessee under normal business conditions.
- E. **Asbestos Abatement:** The wrecking or removal of structural members that contain friable asbestos-containing material by coating, binding, or



resurfacing of walls, ceilings, pipes, or other structures for the purpose of minimizing friable asbestos-containing material from becoming airborne; enclosing friable asbestos-containing material to make it inaccessible; removing friable asbestos-containing material from any pipe, duct, boiler, tank, reactor, furnace, or other structural member including resilient floor tile and mastic or sheet vinyl flooring, or asbestos contaminated soil, if applicable; or by removing facility components that are asbestos covered or asbestos containing.

- F. Asbestos Assessment:** Any evaluation of asbestos-containing material, or suspected asbestos-containing material, which determines the need for a response action.
- G. Asbestos Coordinator(s):** The persons designated to ensure that the asbestos requirements/regulations set by the Environmental Protection Agency are properly implemented and maintained. The WDOC Safety Managers will be designated as the asbestos coordinators.
- H. Certified Inspector:** *(For this policy only.)* An individual, third party, or WDOC employee who has taken an Environmental Protection Agency approved training and has successfully completed an approved course of instruction as an Asbestos Building Inspector. The WDOC Safety Managers are Certified Inspectors.
- I. Encapsulation:** *(For this policy only.)* Application of a liquid material to asbestos-containing material, which controls the possible release of asbestos fibers from the material either by creating a membrane over the surface (bridging encapsulate) or by penetrating into the material and binding its components together (penetrating encapsulate).
- J. Enclosure:** *(For this policy only.)* An airtight, impermeable, permanent barrier around asbestos-containing material to minimize the release of asbestos fibers into the air.
- K. Facility Asbestos Coordinator:** The Facility Maintenance Manager, who has taken a forty (40) hour asbestos contractor/supervisor course.
- L. Friable:** *(For this policy only.)* Material containing asbestos, which when dry, may be crumbled, pulverized, or reduced to powder by hand pressure. This includes previously non-friable material after such material becomes damaged to the extent that when dry it may be crumbled, pulverized, or reduced to powder by hand pressure.
- M. Functional Space:** *(For this policy only.)* A room, group of rooms, or homogeneous area (including crawl spaces or the space between a dropped



ceiling and the floor or roof deck above) designated by a person certified to prepare management plans, design abatement projects, or conduct response actions.

- N. **Homogeneous Area:** *(For this policy only.)* An area of surfacing material, thermal system insulation material, or miscellaneous material that is uniform in color and texture.
- O. **Non-Friable:** Material which, when dry, may not be crumbled, pulverized, or reduced to powder by hand pressure.
- P. **Operations and Maintenance Program:** *(For this policy only.)* A program of work practices to maintain friable asbestos-containing building material in good condition, ensure cleanup of asbestos fibers previously released, and prevent further release by minimizing and controlling friable asbestos-containing building material disturbance or damage.
- Q. **Polarized Light Microscopy (PLM):** An analytical technique used for identifying types of asbestos fibers in bulk material samples.
- R. **Response Action:** *(For this policy only.)* A method, including removal, encapsulation, enclosure, repair, operations, and maintenance that protect human health and the environment from friable asbestos containing material.
- S. **Resilient Floor Tile:** *(For this policy only.)* Tile, which may include vinyl asbestos tile (VAT), asphalt tile, and rubber tile. Tile often appears as 9"x9" or 12"x12" floor tile squares. Floor tile is assumed to contain asbestos unless bulk sample analysis proves otherwise.
- T. **Sampling Area:** *(For this policy only.)* Any area, whether contiguous or not, within a building that contains friable or non-friable material that is homogeneous.

IV. PROCEDURE

- A. **Asbestos Safety.** If any WDOC employee, contract worker, and/or volunteer, in any area/department within any state-owned building occupied or leased by the WDOC, suspects exposure to or disturbance of asbestos-containing materials, the facility maintenance manager shall be contacted immediately. The facility maintenance manager shall determine and implement the immediate response action that is to be taken (*e.g.*, close doors and windows). The WDOC asbestos coordinator and the WDOC Facilities Manager shall be notified promptly. All suspect material must be assumed to be ACM, unless proven otherwise through sampling.



B. Inspections

1. Prior to conducting any work, remodel, or renovation project, or asbestos response action in an area where ACM is suspect, the WDOC Asbestos Coordinator shall inspect the affected area of such buildings to identify all locations of friable, non-friable, and potentially friable ACM. Potentially friable ACM is any ACM that can reasonably be expected to become friable as a result of unanticipated damage during renovation or demolition work.
2. Each inspection shall be made by a certified building inspector.
3. Facilities shall provide WDOC Asbestos Coordinators or contractors with a knowledgeable maintenance representative to assist with escorting them around the building, providing any tools/materials necessary to perform their function, and to explain the nature of the work to be performed. Normally this will be accomplished by the facility asbestos coordinator.
4. The person performing the inspection shall:
 - i. Visually inspect the area to identify the locations of all suspected friable and non-friable ACM;
 - ii. Identify all areas of friable or non-friable suspected ACM and all areas of potentially friable suspected ACM;
 - iii. Determine, through review of documentation provided by the asbestos coordinator, if all areas of friable or non-friable suspected ACM and all areas of potentially friable suspected ACM within the location of the pending work, remodel, or renovation have been previously sampled and found to not contain ACM.
 - iv. Pursuant to sampling, collect samples from each suspect area and submit such samples for analysis, pursuant to EPA Regulations; and
 - v. Develop a written assessment of the extent, condition, and types of materials in the area.
5. The asbestos coordinator will document and maintain the records of the following:



- i. An inspection report with the date of the inspection signed by the certified person making the inspection;
 - ii. An inventory of the locations of the areas where samples are collected, exact locations where each sample is collected, and dates that samples are collected;
 - iii. A list identifying each area as surfacing material, thermal system insulation, or miscellaneous material; and
 - iv. Assessments made of friable, non-friable, and potentially friable material, the name and signature of each certified inspector making the assessment.
- C. **Sampling.** Prior to conducting repairs or work on areas of suspect or assumed ACM, a certified inspector shall collect, in a randomly distributed manner that is representative of the area, samples from each area of suspect friable, non-friable, and potentially friable ACM. The samples shall be collected, in accordance with EPA Asbestos Regulations.
- D. **Analysis**
 1. The WDOC shall have samples analyzed for asbestos by laboratories accredited by the National Institute of Standards and Technology. The WDOC shall ensure the use of laboratories that have received interim accreditation for polarized light microscopy (PLM) analysis under the EPA Interim Asbestos Bulk Sample Analysis Quality Assurance Program, until the NBS PLM laboratory accreditation program for PLM is operational.
 2. Asbestos samples shall not be composited or combined for analysis.
 3. Interpreting Sample Results:
 - i. A homogeneous area is considered not to contain ACM only if the results of all samples submitted for analysis show asbestos in amounts of one percent (1%) or less.
 - ii. If the results of one or more samples collected from this area shows that asbestos is present in an amount greater than one percent (1%), then the area shall be determined to contain ACM.
 4. The name and address of each laboratory performing an analysis shall be submitted to the asbestos coordinator.



5. Air samples shall be analyzed according to EPA Regulation.

E. Assessment

1. For each inspection conducted, a certified building inspector shall provide a written assessment of all friable material that is known or assumed to be ACM in any state owned building occupied or leased by the WDOC.
2. Each certified building inspector providing a written assessment shall sign and date the assessment and submit a copy of the assessment to the asbestos coordinator.
3. The certified building inspector shall classify and give reasons in the written assessment for classifying the ACM and suspected ACM in the building. The ACM or suspect ACM will be categorized, in accordance with EPA Regulations.
4. Assessment shall include the following considerations:
 - i. Location and the amount of the material;
 - ii. Condition of the material, specifying:
 - a. Type of damage (*e.g.*, flaking, blistering, water damage, or other signs of physical damage);
 - b. Severity of damage (*e.g.*, major flaking, severely torn jackets, as opposed to occasional flaking, minor tears to jackets); and
 - c. Extent or spread of damage over large areas or large percentages of the homogeneous area.
 - iii. Whether the material is accessible by building occupants;
 - iv. The material's potential for disturbance;
 - v. Known or suspected causes of damage or significant damage (*e.g.*, air erosion, vandalism, vibration, water);
 - vi. Preventive measures, which might eliminate the reasonable likelihood of undamaged ACM from becoming damaged or significantly damaged; and
 - vii. The results of any air monitoring.



5. Asbestos abatement projects of non-friable ACM that do not require a permit will require notification of the Wyoming Department of Environmental Quality (DEQ). It will be the responsibility of the asbestos coordinator or the WDOC Facilities Manager to make this notification.
6. If it is determined that an asbestos abatement project will for any reason require a permit, then the asbestos coordinator shall be notified immediately.

F. Recordkeeping. For each action taken, the facility maintenance manager shall ensure that the following be documented, maintained with building records, and copied to the asbestos coordinator:

1. A detailed written description of the measure or action, including methods used; the location where the measure or action was taken; reasons for selecting the measure or action; start and completion dates of the work; names and addresses of all contractors involved; and if ACM is removed, the name and location of storage or disposal site of the ACM; and
2. The name and signature of any person collecting any air samples required to be collected by sampling; the locations where samples were collected; date of collection; the name and address of the laboratory analyzing the samples; the date, results, method, and name and signature of the person performing the analysis; and a statement that the laboratory meets the accreditation requirements.

G. Training Requirements

1. All DOC employees, contract workers, and/or volunteers who have the potential of coming into contact with ACM shall, at a minimum, attend asbestos awareness training.
2. Each facility maintenance manager shall attend an approved contractor/supervisor course and shall attend an eight (8) hour refresher course annually.

H. Abatement Process

1. WDOC staff, contract staff, and inmates shall not be involved in any asbestos abatement in WDOC facilities, unless all persons involved in the abatement have been fully trained and certified to do under EPA/DEQ/OSHA requirements. Unless and until such training and certification has been completed and documented, remediation of ACM



shall only be accomplished by an EPA/DEQ certified asbestos abatement contractor.

2. If it is determine that an abatement is required to remediate the asbestos, the following procedures must be followed:
 - i. Contact WDOC Facility Manager and WDOC Asbestos Coordinator(s); and
 - ii. If it is then determined to be a risk management issue, the Risk Management Office shall be contacted by the facility Business Office within seven (7) business days.

I. Responsibility. The Wyoming Department of Corrections shall:

1. Ensure that the activities of all persons who perform inspections or conduct asbestos abatement actions are carried out in accordance with this Policy;
2. Designate an asbestos coordinator to ensure that the requirements of this Policy are properly implemented; and
3. Ensure that the asbestos coordinator receives adequate training to perform duties assigned, pursuant to EPA Regulations, and demonstrates knowledge in relevant federal and state regulations concerning asbestos.

V. TRAINING POINTS

- A. What should employees, contractors or volunteers do if they suspect exposure to or disturbance of asbestos-containing material?
- B. Who is to conduct asbestos inspections and under what circumstances are inspections to be conducted?
- C. What training is required for asbestos safety?
- D. TRUE OR FALSE. Staff, contractors, and inmates may be involved in asbestos abatement activities.